

REMARKS

Claims 1, 3-6 and 8-34 are pending and stand rejected. In the previous response, Applicant articulated distinctions between the pending claims and the cited references thus indicating the references insufficient to meet the pending claims. The content of the previous response is incorporated by reference in its entirety. Applicant respectfully traverses the rejections and requests a withdrawal of all rejections as set forth below.

Claims 1, 3-6, and 8-34 stand rejected under 35 U.S.C. 102(b) as anticipated by or, in the alternative, under 35 U.S.C. 103 (a) as obvious over Halperin (U.S. 5,564,434). The Examiner's position with regard to Halperin is that the insulating sleeve is a coating over a cable conductor. Applicant respectfully asserts that the Examiner's interpretation does not correspond to what is actually taught for a number of reasons. The Examiner considers the inner coiled wire conductor 16 as taught by Halperin to be a cable conductor. A coiled wire is clearly not a cable conductor. Applicant respectfully submits that a coiled wire conductor is, as its name describes, a wire formed into the shape of a coil and thus has a central lumen defined by the coil. A cable conductor is a conductor including multiple strands or wires bundled together to form a cable conductor. A cable conductor generally does not have a central lumen but instead has a center wire around which additional wires are bundled (see for example paragraph 20 and Figure 4 of the instant application). As described in paragraph 29 and shown in Figure 6B of the instant application, the cable conductor includes multiple wires divided up into a center strand, intermediate strands bundled about the center strand, and outer strands bundled about the intermediate strands. Applicant submits that it would be readily apparent to one having ordinary skill in the art that a "cable conductor" is a structure that is distinct from a "coiled wire conductor." Accordingly, the Examiner's interpretation

that Halperin teaches a cable conductor extending within the lumen of the coil conductor cannot stand.

The Examiner also considers the insulating sleeve 22 of Halperin's lead to be a coating. The insulating sleeve 22 separating the inner coiled conductor 16 and the outer coiled conductor 14 is clearly not a coating. The insulating sleeve 22 is required to extend over the crimp sleeve 66 according to the teachings of Halperin (col. 9 lines 5-6). Since sleeve 22 is required to be a sleeve that can extend over the crimp sleeve 66, insulating sleeve 22 is clearly not a coating. Insulating sleeve 22 is shown and described as a separate member. As such, the insulating sleeve separating inner and outer coiled wire conductors cannot under any logically supportable analysis be said to include a coating on a cable conductor.

The Examiner states that there is necessarily a gap between the coil 14 and the coil 16 since they are not unitary. However, the claim language specifies "an average gap exists between the insulative layer and an interior surface of the lumen of the coil conductor." This average gap is never taught nor addressed by Halperin and is not necessarily present since an outer diameter of the insulating sleeve may match the inner diameter of the coil wire conductor lumen.

Claim 7, now cancelled, stands rejected under 35 U.S.C. 103 (a) as being unpatentable over Halperin (U.S. 5,564,434) in view of Cobian (U.S. 5,796,044). The Examiner relies on Cobian to teach coating a conductor wire coil to enable a tight and intimate connection between the coil and the insulation. However, Halperin does not provide any suggestion or motivation for requiring a tight and intimate bond since the insulating sleeve is required to extend over the crimp sleeve 66 as discussed above. Furthermore, in reference to coated coiled wire conductors Cobian describes defects that can occur in the coatings (col. 4 beginning at line 24). Cobian teaches an improved insulation technique using a loose insulative jacket or sheath that allows a space between the conductor wire

P0020093

Applicants: Mark T. Marshall et al.

Response to Office Action February 11, 2008

Serial No. 10/759,997

Page 9

coils and the surrounding sheath. Cobian therefore teaches away from the use of an insulating coating over a coiled wire conductor. Accordingly there is no motivation in the teachings of Cobian to modify Halperin's insulative sleeve in the manner suggested by the Examiner. To the contrary, Cobian's teachings support the use of a loose insulating sleeve.

Neither Halperin nor Cobian, taken singly or combined, teach, suggest or imply an elongate cable conductor extending within the lumen of the coil conductor and a coating on an exterior surface of the cable conductor as specified in the pending claims. Applicant respectfully asserts the rejection is improper and should be withdrawn. Applicant further asserts that the present claims are in condition for allowance. Withdrawal of the instant rejections and issuance of a Notice of Allowance is respectfully requested.

Respectfully submitted,

April 11, 2008
Date

/Carol F. Barry/
Carol F. Barry
Reg. No. 41,600
(763) 514-4673
Customer No. 27581